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June 7, 2024

Via ECF

Hon. Michael A. Hammer, U.S.M.J.
Martin Luther King Building & U.S. Courthouse
Courtroom MLK 2C
50 Walnut Street
Newark, NJ 07101

**Re: Niemczyk v. Pro Custom Solar LLC
Docket No. 2:19-cv-7846-ES-MAH**

**Walters, et al. v. Pro Custom Solar, LLC
Docket No. 2:22-cv-00247-ES-MAH**

Joint Request for Scheduling Extension

Dear Judge Hammer:

The parties provide this Joint Letter pursuant to the November 26, 2019 Pretrial Scheduling Order, Dkt. No. 20, and the Court's March 21, 2024 and April 26, 2024 Text Orders, ECF Nos. 160.

We write, with the consent of all parties, to respectfully request a one-month extension to the class certification deadlines ordered by the Court on April 26, 2024. See Dkt. No. 160. Counsel believe they have come to an agreement in principle on all key provisions of the Settlement Term Sheet but are waiting on final approval of the parties. Once the term sheet is executed, the parties will jointly request for the Court to vacate the class certification deadlines altogether so that they can focus on executing a long-form settlement agreement in line with the term sheet. The parties intend to finalize and execute a full settlement agreement, and all corresponding exhibits thereto, within 60 days of executing the term sheet. In lieu of class certification deadlines, the parties will then ask to set deadlines for the filing of an anticipated motion for preliminary approval.

Allowing this progress to continue will be in the best interests of the parties and this Court. With that in mind, the parties respectfully propose the below extensions related to the class certification deadlines ordered by the Court:

Hon. Michael A. Hammer, U.S.M.J.
 June 7, 2024
 Page 2

Event	Current Deadline	Requested Extension
Plaintiffs' Motion for Class Certification	June 7, 2024	July 8, 2024
Defendant's Opposition to Motion for Class Certification	July 29, 2024	August 30, 2024
Plaintiffs' Reply in Support of Class Certification	August 30, 2024	September 30, 2024

If this request is acceptable to Your Honor, then the parties respectfully request this letter be stamped "So Ordered" and entered upon the dockets for both *Niemczyk* and *Walters*. Should Your Honor require additional information, we will provide it immediately.

Respectfully submitted,

**MAZIE SLATER KATZ &
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cc: All Counsel (via ECF)

SO ORDERED

s/ Michael A. Hammer
 Michael A. Hammer, U.S.M.J.

Date: *6/10/2024*